



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

August 4, 2014

Mr. Doug Pomeroy
Federal Aviation Administration
San Francisco Airports District Office
1000 Marina Boulevard, Suite 220
Brisbane, California 94005-1835

Subject: Final Environmental Impact Statement (FEIS), Gness Field Airport Proposed Extension of Runway 13/31, Marin County, California (CEQ # 20140184)

Dear Mr. Pomeroy:

The U.S. Environmental Protection Agency (EPA) has reviewed the above-referenced document pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act.

EPA reviewed the Draft Environmental Impact Statement (DEIS) and provided comments to the Federal Aviation Administration on February 6, 2012. We rated the DEIS as Environmental Concerns - Insufficient Information (EC-2) due primarily to the fill of 12 acres of wetlands, the loss of 23 acres of wildlife habitat, and the reduction in floodplain that would result from the runway extension. Because the DEIS indicated the purpose of the runway extension is to accommodate a small percentage of corporate jets that are restricted from operating at full weight on the current runway when under certain weather conditions, we recommended evaluation of a shorter runway extension to reduce the stated impacts while still accommodating all B-I aircraft landings (DVO is a B-1 airport) in all adverse weather conditions and improving efficiency for some business jets in hot day conditions. The FEIS, which presents the purpose in more general terms, does not evaluate this alternative, stating that only an extension to 4,400 feet will meet the project proponent's purpose and need. An alternatives analysis is also required for the Clean Water Act Section 404 permit (40 CFR 230.10(a)). EPA will further engage with the project proponent during the 404 permit phase to ensure that all reasonable alternatives have been evaluated as required by the Clean Water Act.

We appreciate the improved discussion of compensatory mitigation options for wetlands impacts in the FEIS in response to our comment. The discussion still incorrectly implies that sufficient mitigation can be obtained solely through payment into a larger restoration effort. The mitigation proposal can fit into a larger plan, but the permittee will need to develop a full mitigation project that includes responsibility for implementation and addresses all the components identified in the Mitigation Rule (40 CFR Part 230, Subpart J). We will work with the project proponent and Army Corps of Engineers to further develop mitigation options during the 404 permit phase.

EPA also commented on the lack of discussion of increased flooding potential from climate change effects, particularly sea level rise, for the airport site, which is located close to sea level within the 100-year floodplain. Since the time EPA reviewed the DEIS in 2012, President Obama signed *Executive Order 13653 - Preparing the United States for the Impacts of Climate Change* (November 2013). This

E.O. encourages actions by the federal government to enhance climate preparedness and resiliency. The FEIS states that the runway extension project does not include providing flood protection for Gness Field Airport in either the short or long term, stating that this is beyond the scope of this EIS and would be handled through other region-wide efforts (p. 5-158). The FEIS adds that “consideration will be given during the impact evaluation to the existing system of ditches and levees that help protect the Airport from flooding” (p. 5-157). This evaluation is not included in the FEIS, and it is unclear when it would be conducted. Without it, the FEIS’s discussion of climate change effects is incomplete. The impact evaluation, once conducted, may reveal that adaptation measures would be needed to improve the project’s preparedness and resilience to the effects of climate change. We recommend that completion of this evaluation be a condition of approval for FAA funding, along with a requirement that the project description be updated to include any necessary upgrades to ditches/levees or other adaptation measures, as necessary to protect the project.

The analysis for induced growth contained the assumption that the runway length extension would not induce an increased percentage of larger aircraft to utilize the airport. The basis for this assumption remains unclear. It also appears to be contradicted by a tenant letter stating that a longer runway would facilitate the tenant’s plans to acquire larger aircraft¹, as well as by a media quote of a pilot stating that an extension would open the airport to some jet aircraft, such as the Learjet and Beechjet lines, that require longer runways. This inconsistency raises questions about the accuracy of the noise analysis. We recommend that the FAA condition its funding to require post-project noise monitoring and an evaluation to confirm the accuracy of noise level predictions, with the stipulation that, should noise levels rise above the 65 A-weighted decibel (dBA) significance level, the Airport’s voluntary noise abatement program measures would be made requirements for runway use. Finally, the FEIS does not resolve our comment regarding the inconsistency of the proposed action with FAA bird-strike hazard mitigation guidance. We recommend this be addressed in the Record of Decision.

EPA appreciates the opportunity to review this FEIS. We would appreciate receiving a copy of the Record of Decision once it has been signed. If you have any questions, please contact me at 415-972-3521, or contact Karen Vitulano, the lead reviewer for this project, at 415-947-4178 or vitulano.karen@epa.gov.

Sincerely,



FDR

Kathleen Martyn Goforth, Manager
Environmental Review Section

¹ The tenant letter stating this is included in Appendix D of the DEIS. It was not found in the FEIS.